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ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

JUL 16 2010

CLERK, U.S. DISTRICT COURT

By Deputy *MR*

THE POKÉMON COMPANY
INTERNATIONAL, INC., a corporation,

Plaintiff,

vs.

BECKETT MEDIA LLC, a corporation,

Defendant.

CASE NO.

JUDGE

COMPLAINT

8-10CV1392-D

40234

8/11/10
131148

Plaintiff, The Pokémon Company International, Inc. ("Pokémon"), alleges as follows:

PARTIES

1. Plaintiff, The Pokémon Company International, Inc., is a Delaware corporation with its principle place of business at 333 108th Avenue NE, Suite 1900, Bellevue, Washington 98004.

2. Defendant, Beckett Media LLC ("Defendant" or "Beckett"), is a limited liability company governed by the laws of the State of Delaware with its principal place of business at 4635 McEwen Road, Dallas, Texas 75244. On information and belief, no member of Beckett Media LLC is a resident of Delaware or Washington. Beckett may be served through its registered agent, Corporation Service Company d/b/a CSC-Lawyers Inc., 701 Brazos, Suite 1050, Austin, Texas 78701.

JURISDICTION AND VENUE

3. This Court has jurisdiction because this is an action arising under the Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, *et seq.* (the "Copyright Act"), jurisdiction being

conferred in accordance with 28 U.S.C. § 1338(a); and (2) this is a civil action between citizens of different states in which the value of the amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs, jurisdiction being conferred in accordance with 28 U.S.C. § 1332.

4. Venue is proper in this Court either under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district, or under 28 U.S.C. § 1391(c) because Beckett resides in this judicial district and is subject to personal jurisdiction herein.

FACTS

5. Pokémon manufactures, markets and distributes a variety of children's entertainment products, including movies, television shows, its trading card game and toys throughout the United States.

6. The "Pokémon phenomenon" began in Japan in 1996 and gave rise to one of the most popular children's entertainment properties in the world. With more than 11 movies, 12 seasons of television shows, a thriving trading card game, and an extensive line of toys and merchandise, Pokémon delivers a wide range of fun, family-friendly entertainment to consumers in the United States and around the world.

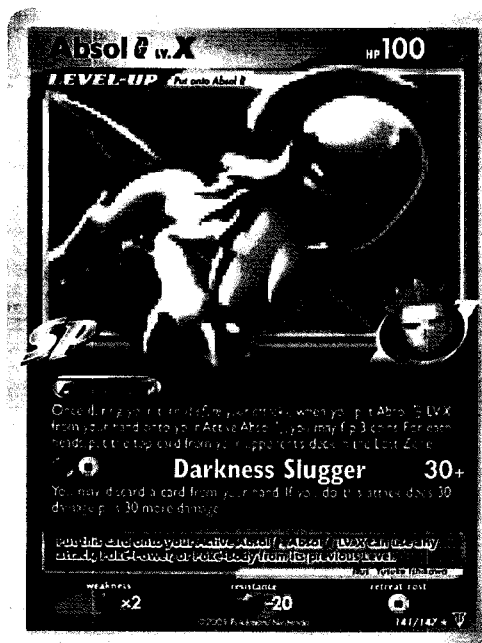
POKÉMON'S TRADING CARD GAME AND COPYRIGHTED WORKS

7. At the center of Pokémon's business is its trading card game, which consists of collectible cards (the "Trading Card Game"). Each card depicts a Pokémon character, as well as the character's powers and abilities, an image of the character and a description of the character.

Players collect trading cards to assemble their optimal decks, which consist of a discrete number of cards that may be played in a given Trading Card Game match.

8. To build on the Trading Card Game, Pokémon releases expansion sets of new trading cards that players can incorporate into their existing decks for use in the Trading Card Game. Each new expansion set attracts substantial fanfare from Pokémon enthusiasts, who eagerly anticipate the release of new Pokémon cards included in new expansion sets.

9. On August 19, 2009, Pokémon released the "Pokémon Trading Card Game Platinum -- Supreme Victors" expansion set of trading cards ("Supreme Victors"), which consists of 153 unique trading cards. For example, one card from the Supreme Victors expansion set is card number 141, which depicts the Pokémon character Absol:

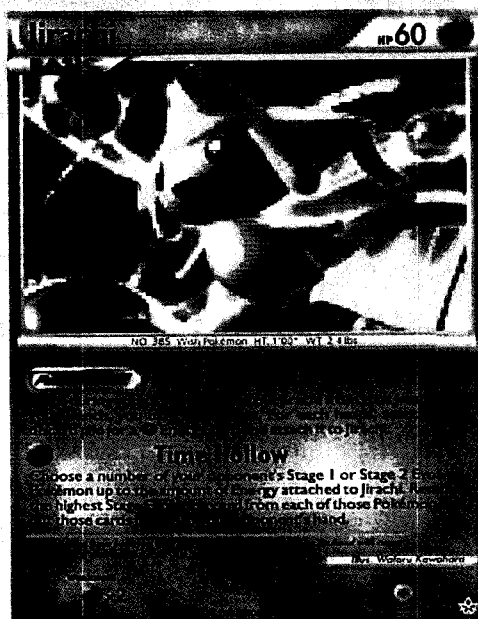


10. On February 10, 2010, Pokémon released the "Pokémon Trading Card Game HeartGold SoulSilver" expansion set of trading cards ("HGSS"), which consists of 123 unique

trading cards. For example, one card from the HGSS expansion set is card number 17, which depicts the Pokémon character Cleffa:



11. On May 12, 2010, Pokémon released the "Pokémon Trading Card Game HeartGold SoulSilver -- Unleashed" expansion set of trading cards ("Unleashed"), which consists of 95 unique trading cards. For example, one card from the Unleashed expansion set is card number 1, which depicts the Pokémon character Jirachi:



12. Pokémon owns exclusive rights under the Copyright Act for each of the individual trading cards in the Supreme Victors, HGSS, and Unleashed expansion sets. Pokémon has registered its copyrights in each of the trading card works for the Supreme Victors, HGSS and Unleashed series. Pokémon's registrations include the following:

Supreme Victors:

Title	Copyright Reg. No.
Supreme Victors - Venusaur (13/153)	VA1-702-111
Supreme Victors - Plusle (76/153)	VA1-702-487
Supreme Victors - Battle Tower (134/153)	VA1-702-412
Supreme Victors - Absol [G] LV.X (141/153)	VA1-702-401
Supreme Victors - Blaziken [FB] LV.X (142/153)	VA1-702-400
Supreme Victors - Charizard [G] LV.X (143/153)	VA1-702-398
Supreme Victors - Rayquaza [C] LV.X (146/153)	VA1-702-392

HGSS:

Title	Copyright Reg. No.
HeartGold SoulSilver - Arcanine (1/123)	VA1-707-083
HeartGold SoulSilver - Azumarill (2/123)	VA1-707-082
HeartGold SoulSilver - Gyarados (4/123)	VA1-707-091
HeartGold SoulSilver - Hitmontop (5/123)	VA1-707-287
HeartGold SoulSilver - Jumpluff (6/123)	VA1-707-286

Title	Copyright Reg. No.
HeartGold SoulSilver - Ninetales (7/123)	VA1-707-285
HeartGold SoulSilver - Noctowl (8/123)	VA1-707-284
HeartGold SoulSilver - Quagsire (9/123)	VA1-707-283
HeartGold SoulSilver - Shuckle (11/123)	VA1-707-281
HeartGold SoulSilver - Wobbuffet (13/123)	VA1-707-279
HeartGold SoulSilver - Ampharos (14/123)	VA1-707-278
HeartGold SoulSilver - Ariados (15/123)	VA1-707-327
HeartGold SoulSilver - Butterfree (16/123)	VA1-707-326
HeartGold SoulSilver - Cleffa (17/123)	VA1-707-325
HeartGold SoulSilver - Exeggutor (18/123)	VA1-707-324
HeartGold SoulSilver - Farfetch'd (19/123)	VA1-707-323
HeartGold SoulSilver - Feraligatr (20/123)	VA1-707-322
HeartGold SoulSilver - Furret (21/123)	VA1-707-244
HeartGold SoulSilver - Hypno (23/123)	VA1-707-239
HeartGold SoulSilver - Lapras (24/123)	VA1-707-238
HeartGold SoulSilver - Ledian (25/123)	VA1-707-418
HeartGold SoulSilver - Meganium (26/123)	VA1-707-417
HeartGold SoulSilver - Persian (27/123)	VA1-707-416
HeartGold SoulSilver - Smoochum (30/123)	VA1-707-413
HeartGold SoulSilver - Sunflora (31/123)	VA1-707-410
HeartGold SoulSilver - Typhlosion (32/123)	VA1-707-330
HeartGold SoulSilver - Tyrogue (33/123)	VA1-707-329
HeartGold SoulSilver - Weezing (34/123)	VA1-707-328
HeartGold SoulSilver - Bayleef (35/123)	VA1-707-311
HeartGold SoulSilver - Blissey (36/123)	VA1-707-310
HeartGold SoulSilver - Corsola (37/123)	VA1-707-309
HeartGold SoulSilver - Croconaw (38/123)	VA1-707-308
HeartGold SoulSilver - Delibird (39/123)	VA1-707-306
HeartGold SoulSilver - Donphan (40/123)	VA1-707-305
HeartGold SoulSilver - Dunsparce (41/123)	VA1-707-304
HeartGold SoulSilver - Flaaffy (42/123)	VA1-707-303
HeartGold SoulSilver - Heracross (43/123)	VA1-707-302
HeartGold SoulSilver - Copycat (90/123)	VA1-707-272
HeartGold SoulSilver - Poke Gear 3.0 (96/123)	VA1-707-210
HeartGold SoulSilver - Pokemon Communication (98/123)	VA1-707-203
HeartGold SoulSilver - Pokemon Reversal (99/123)	VA1-707-201
HeartGold SoulSilver - Blissey (Prime) (106/123)	VA1-707-192
HeartGold SoulSilver - Donphan (Prime) (107/123)	VA1-707-176
HeartGold SoulSilver - Feraligatr (Prime) (108/123)	VA1-707-145
HeartGold SoulSilver - Typhlosion (Prime) (110/123)	VA1-707-320
HeartGold SoulSilver - Ho-Oh LEGEND (111/123)	VA1-707-290
HeartGold SoulSilver - Ho-Oh LEGEND (bottom) (112/123)	VA1-707-289
HeartGold SoulSilver - Lugia LEGEND (top) (113/123)	VA1-707-288
HeartGold SoulSilver - Lugia LEGEND (bottom) (114/123)	VA1-707-142

Unleashed:

Title	Copyright Reg. No.
HGSS Unleashed - Jirachi (1/95)	VA1-718-929
HGSS Unleashed - Magmortar (2/95)	VA1-719-134
HGSS Unleashed - Metagross (4/95)	VA1-719-142
HGSS Unleashed - Mismagius (5/95)	VA1-719-124
HGSS Unleashed - Octillery (6/95)	VA1-719-388
HGSS Unleashed - Politoed (7/95)	VA1-719-384
HGSS Unleashed - Shaymin (8/95)	VA1-719-390
HGSS Unleashed - Sudowoodo (9/95)	VA1-719-393
HGSS Unleashed - Torterra (10/95)	VA1-719-394
HGSS Unleashed - Entei & Raikou Legend (HP 140) (90/95)	VA1-719-110
HGSS Unleashed - Entei & Raikou Legend (91/95)	VA1-719-112
HGSS Unleashed - Suicune & Entei Legend (HP 160) (94/95)	VA1-719-128
HGSS Unleashed - Suicune & Entei Legend (95/95)	VA1-719-115

Copies of the Certificates of Registration issued by the United States Copyright Office for these works are attached as **Exhibit "A."** Images of these works are set forth in **Exhibit "B."** Collectively, the works depicted in these registrations comprise the "Pokémon Works."

BECKETT'S ACTIONS

13. Through its online Beckett Marketplace, located at <http://www.beckett.com/marketplace/default.osi>, Beckett offers a secondhand market that enables Internet users to buy and sell various types of sports cards, trading cards, and other memorabilia, including Pokémon trading cards.

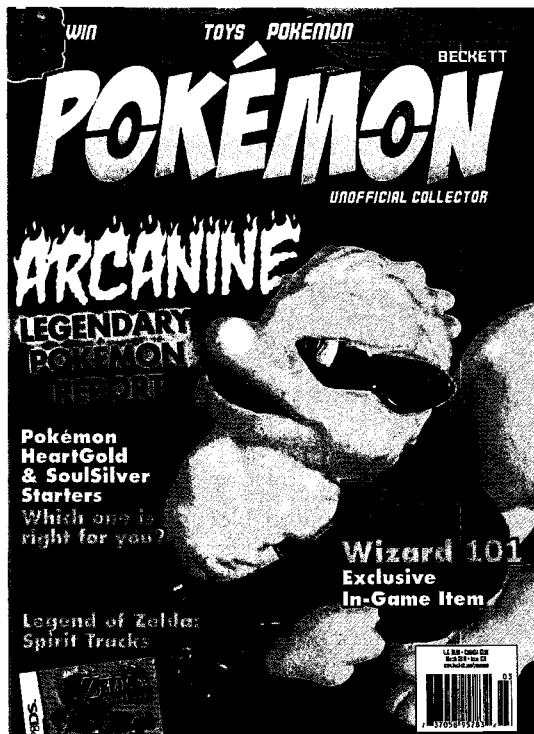
14. Beckett receives a commission, calculated as a percent of the sale price, from each sale transacted through the Beckett Marketplace. Beckett requires sellers to pay these commissions by deducting from points accounts sellers maintain with Beckett. Points correspond to dollar amounts and are nonrefundable. Beckett requires that sellers purchase points in fixed bundles. A true and accurate copy of Beckett's Trade Terms of Service

Agreement, an attachment to Beckett's Member Terms of Service Agreement, setting out this arrangement is attached as **Exhibit "C."**

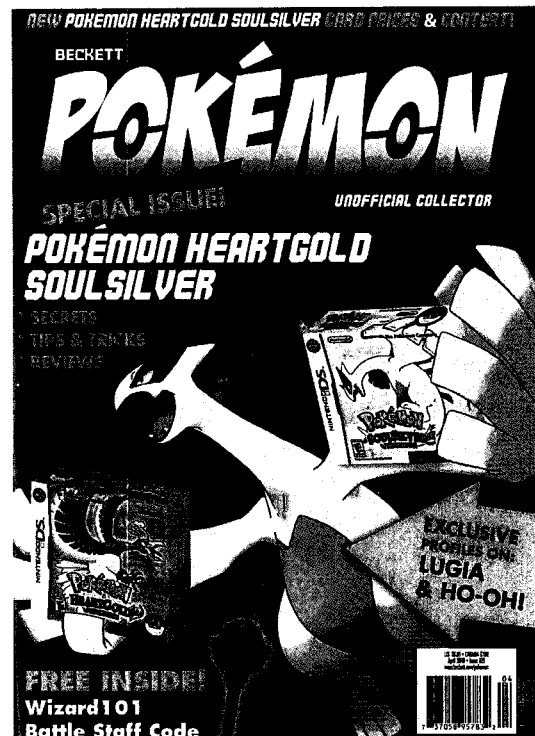
15. In addition to the Beckett Marketplace, Beckett publishes a variety of magazines devoted to trading cards and collectibles.

16. One such Beckett publication is the "Beckett Pokémon Unofficial Collector!" magazine (the "Beckett Magazine"). The Beckett Magazine is a monthly publication that includes a price guide for Pokémon trading cards and features articles relating to Pokémon's Trading Card Game, characters, video games, television shows, movies and toys. Cover images of the four most recent issues of the Beckett Magazine are set forth below:

Issue 124 (March 2010)

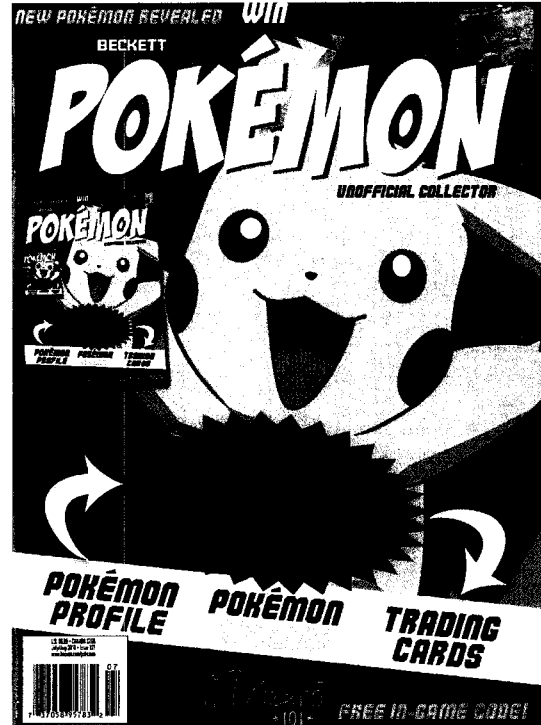
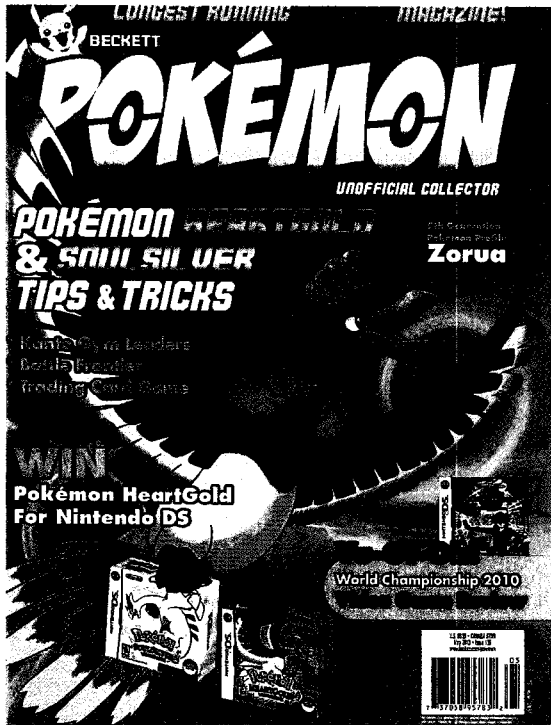


Issue 125 (April 2010)



Issue 126 (May 2010)

Issue 127 (July/August 2010)



17. Beckett's sales of the Beckett Magazine increase the amount of sales transacted through the Beckett Marketplace.

18. The Beckett Magazine appropriated the Pokémon Works by publishing full scans of numerous Supreme Victors and HGSS trading cards copied from the Pokémon Works. The Pokémon Works appeared in the Beckett Pokémon Unofficial Collector! magazine in issue numbers 124 (March 2010), 125 (April 2010), 126 (May 2010) and 127 (July/August 2010). Copies of the portions of these magazines relevant to this dispute are attached as **Exhibit "D."**

19. For each of the individual works that comprise the Pokémon Works, Pokémon's registrations were effective, pursuant to 17 U.S.C. § 412, prior to Beckett's acts of infringement for each such work.

20. Beckett copied and published the Pokémon Works in their entirety in the Beckett Magazine, on information and belief, to increase its sales of the Beckett Magazine and drive sales and other traffic through the Beckett Marketplace.

POKÉMON'S PREVIOUS DEMANDS

21. Pokémon has demanded on multiple occasions that Beckett not use Pokémon's copyrighted trading cards or other Pokémon content in Beckett's publications.

2007 DEMANDS

22. On November 1, 2007, Pokémon wrote Beckett and demanded that Beckett cease using copyrighted Pokémon materials. Pokémon expressed its opinion in the letter that Beckett's publication in 2006 of exact copies of 386 copyrighted Pokémon trading cards constituted copyright infringement of those works and demanded that Beckett cease all publication and distribution of such materials. A true and correct copy of this letter is attached as **Exhibit "E."**

23. On November 9, 2007, Beckett responded and claimed that Pokémon had granted an implied license to use Pokémon's content in its publications. Thus, Beckett argued, its exact copying of hundreds of Pokémon's copyrighted works was permitted and did not constitute copyright infringement. A true and correct copy of this letter is attached as **Exhibit "F."**

24. On December 10, 2007, Pokémon's counsel denied the existence of any such implied license to use Pokémon's content, and clarified that, to the extent any implied license might exist, Pokémon expressly revoked all such rights. Pokémon reiterated its demands that that Beckett cease all publication and distribution of such materials. A true and correct copy of this letter is attached as **Exhibit "G."**

25. On December 13, 2007, Beckett's counsel responded, asserting that Pokémon's alleged knowledge of Beckett's activities and purchase of advertising space in Beckett's publication created an implied license that superseded Pokémon's copyright infringement claim. Nonetheless, Beckett acknowledged that Pokémon did not authorize or license Beckett to use or publish Pokémon content, and agreed to discontinue its advertising and sales of books containing such copied works. As to the revocation of any "implied license," Beckett added that this understanding would "inform all future issues of the Beckett monthly unofficial collector magazine which focuses on Pokemon [sic] trading cards and other collectibles." A true and correct copy of this letter is attached as **Exhibit "H."**

26. On December 21, 2007, Pokémon sought clarification of the terms Beckett raised in its December 13, 2007, letter, namely, discontinuing publications relating to Pokémon content and how Pokémon's demands would "inform" Beckett's future publications. A true and correct copy of this letter is attached as **Exhibit "I."**

27. Beckett never responded to Pokémon's December 21, 2007, letter.

2009 DEMANDS

28. In September 2009, Pokémon wrote to Beckett that it had no right to use Pokémon content in its publications. A true and correct copy of this letter is attached as **Exhibit "J."**

29. When Beckett's prior counsel explained that it no longer represented Beckett, Pokémon contacted Brent Diamond, President and CEO of Beckett. On or around September 15, 2009, Mr. Diamond responded with a voice mail message, stating that Beckett no longer sold publications containing Pokémon content.

**BECKETT'S KNOWING AND UNAUTHORIZED
INFRINGEMENT OF THE POKÉMON WORKS**

30. Despite Beckett's previous and explicit denials, Beckett continues to copy the Pokémon Works and distribute those copies as full scans of the Pokémon Works to populate the Beckett Magazine.

31. Despite its specific representations to Pokémon, Beckett copied the entirety of the Pokémon Works.

32. Pokémon did not authorize Beckett's copying, reproduction, display or use of the Pokémon Works that appear in the Beckett Magazine.

33. Beckett knew its publication of the Pokémon Works was not authorized by virtue of the parties' exchanges in 2007 and 2009, detailed above.

**FIRST CLAIM FOR RELIEF
(COPYRIGHT INFRINGEMENT)**

34. Pokémon re-alleges paragraphs 1 through 33, as if fully set forth herein.

35. Beckett's actions constitute willful infringement of Pokémon's exclusive rights in the Pokémon Works under the Copyright Act, 17 U.S.C. §§ 101, *et seq.*, including, but not limited to, Pokémon's exclusive rights to reproduce the Pokémon Works, create derivative works based upon the Pokémon Works and to distribute copies of the Pokémon Works. 17 U.S.C. §§ 106, 501(a).

36. On information and belief, Beckett's acts of infringement are intentional and in knowing violation of Pokémon's exclusive rights in and to the Pokémon Works.

37. Beckett's continued unauthorized reproduction, distribution and display of the Pokémon Works in the Beckett Magazine have caused and will continue to cause irreparable damage to Pokémon and destroy the value of the Pokémon Works in the marketplace. Consequently, Pokémon has no adequate remedy at law and is entitled to an injunction against Beckett's unlawful conduct. 15 U.S.C. § 502.

WHEREFORE, Pokémon prays that:

1. The Court enter judgment against Beckett in the form of a declaration of infringement of Pokémon's copyrights in the Pokémon Works under 17 U.S.C. § 501;
2. Beckett and its officers, agents, servants, employees, and attorneys, their successors and assigns, and all others in active concert or participation with Beckett, be enjoined and restrained under 17 U.S.C. § 502 from advertising, distributing, transferring, selling or otherwise disposing of any reproductions, copies or displays of the Pokémon Works, regardless of the form of such reproductions, copies or displays, and from infringing any of Pokémon's works of authorship, including any other trading cards, images or artwork.
3. Beckett, and all others holding by, through or under Beckett, be required, jointly and severally, to:
 - a. account for and pay to Pokémon:

- (i) actual damages caused by and profits derived from Beckett's copyright infringement as set forth above, under 17 U.S.C. § 504(b); or
 - (ii) should Pokémon so elect under 17 U.S.C. § 504(c), pay to Pokémon statutory damages of \$30,000 to \$150,000 per work infringed for Beckett's willful copyright infringement as set forth above; and
- c. immediately turn over to the Court all infringing copies and all means for reproduction thereof of Pokémon's copyrighted works under 17 U.S.C. § 503, and that those copies be given to Pokémon upon issuance of a final judgment.

4. Pokémon have such other and further relief as the Court deems just and equitable.

Respectfully submitted,

Dated: July 16, Dallas, Texas

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Attorneys for Plaintiff, THE POKÉMON COMPANY
INTERNATIONAL, INC.

EXHIBIT A

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-111

Effective date of
registration:
October 13, 2009

Title _____

Title of Work: Supreme Victors - Venusaur (13/153)

Completion/Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-487

Effective date of
registration:
October 13, 2009

Title _____

Title of Work: Supreme Victors - Plusle (76/153)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-412

Effective date of
registration:
October 13, 2009

Title _____

Title of Work: Supreme Victors - Battle Tower (134/153)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

N. J. Michael Monahan

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-401

Effective date of
registration:
October 13, 2009

Title _____

Title of Work: Supreme Victors - Absol [G] LV.X (141/153)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

1: J. Michael Monahan

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-400

Effective date of
registration:

October 13, 2009

Title

Title of Work: Supreme Victors - Blaziken [FB] LV.X (142/153)

Completion/ Publication

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author

Author: The Pokemon Company International

Author Created: translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-398

Effective date of
registration:
October 13, 2009

Title _____

Title of Work: Supreme Victors - Charizard [G] LVX (143/153)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

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Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

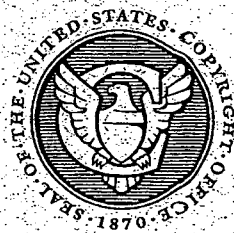
For: J. Michael Monahan

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-702-392

Effective date of
registration:

October 13, 2009

Title _____

Title of Work: Supreme Victors - Rayquaza [C] LV.X (146/153)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: August 19, 2009

Nation of 1st Publication: United States

Author _____

Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

J. Michael Monahan

Date: October 6, 2009

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-707-083

Effective date of
registration:
February 3, 2010

Title _____

Title of Work: HeartGold SoulSilver - Arcanine (1/123)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: January 26, 2010

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Name: J. Michael Monahan

Date: February 2, 2010

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-707-082

Effective date of
registration:
February 3, 2010

Title _____

Title of Work: HeartGold SoulSilver - Azumarill (2/123)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: January 26, 2010

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Name: J. Michael Monahan

Date: February 2, 2010

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-707-091

Effective date of
registration:

February 3, 2010

Title _____

Title of Work: HeartGold SoulSilver - Gyarados (4/123)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: January 26, 2010

Nation of 1st Publication: United States

Author _____

Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Name: J. Michael Monahan

Date: February 2, 2010

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



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Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-707-287

Effective date of
registration:

February 3, 2010

Title _____

Title of Work: HeartGold SoulSilver - Hitmontop (5/123)

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: January 26, 2010

Nation of 1st Publication: United States

Author _____

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim _____

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions _____

Organization Name: The Pokemon Company International

Name: Don McGowan

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Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification _____

Name: J. Michael Monahan

Date: February 2, 2010

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-707-286

Effective date of
registration:

February 3, 2010

Title

Title of Work: HeartGold SoulSilver - Jumpluff (6/123)

Completion/ Publication

Year of Completion: 2009

Date of 1st Publication: January 26, 2010

Nation of 1st Publication: United States

Author

■ Author: The Pokemon Company International

Author Created: Translation

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: The Pokemon Company International

1900-333 108th Avenue NE, Bellevue, WA, 98004, United States

Limitation of copyright claim

Material excluded from this claim: 2-D artwork

New material included in claim: Translation

Rights and Permissions

Organization Name: The Pokemon Company International

Name: Don McGowan

Email: d.mcgowan@pokemon.com

Telephone: 425-274-4857

Address: 1900-333 108th Avenue NE

Bellevue, WA 98004

Certification

Name: J. Michael Monahan

Date: February 2, 2010

Applicant's Tracking Number: 02556000-00013

Correspondence: Yes